



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

January 13, 2005

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Thomas E. Logan, President
Bechtel Hanford, Inc.
3070 George Washington Way
MSIN: H9-04
Richland, Washington 99352

Mr. Joel B. Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. J.P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99352

Mr. Richard H. Gurske, Director
Environmental Protection
Fluor Hanford, Inc.
P.O. Box 1000, MSIN: H8-12
Richland, Washington 99352

RECEIVED
JAN 18 2005

EDMC

Dear Messrs. Klein, Hebdon, Gurske, Logan, and Henschel:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Resource
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion,
(Quarter ending December 31, 2003, Permit Condition I.C.3)

Enclosed are the outstanding Modification Notification Forms previously held in pending, contingent upon completion of actions agreed to in a separate meeting. The Washington State Department of Ecology (Ecology) has reviewed and denied the referenced quarterly Class 1 Modifications indicated below.

The denied quarterly modifications include:

1324-N Surface Impoundment, Chapter 18 Attachment 42: Hanford Facility RCRA Permit, V.18: Denied

1324-NA Percolation Pond, Chapter 19 Attachment 42: Hanford Facility RCRA Permit, VI.3: Denied

Messrs. Klein, Hebdon, Gurske, Logan, and Henschel
January 13, 2005
Page 2

1324-N Surface Impoundment and 1324-NA Percolation Pond, Chapter 3, Attachment 42:

All modifications are denied. Approval of the Post-Closure Groundwater Monitoring Plan is required prior to approval of move to Part VI of the Hanford Facility RCRA Permit.

If you have any questions or comments regarding this letter, please contact me at
(509) 372-7894.

Sincerely,



Greta P. Davis
Hanford Sitewide RCRA Permit Coordinator
Nuclear Waste Program

Enclosures
GD:nc

cc/enc: Mike Hughes, BHI
Roger Landon, BHI
Suzette Thompson, FH
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, ODOE
Administrative Record
Environmental Portal

cc: Todd Martin, HAB

Hanford Facility RCRA Permit Modification Notification Form

Unit: 1324-N Surface Impoundment	Permit Part & Chapter: Part V, Chapter 18, Attachment 42
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Description of Modification:

Hanford Facility RCRA Permit V.18.: Because closure has been completed and certified, delete B1.0 through B4.0. These sections pertain to requirements that were applicable during closure of the 1324-N Surface Impoundment. Move this unit to Part VI, Chapter 3, for postclosure requirements for the 1324-N Surface Impoundment and 1324-NA Percolation Pond..

CHAPTER 18**1324-N Surface Impoundment**

The 1324 N Surface Impoundment is an inactive TSD unit that is currently undergoing modified closure activities. This TSD unit was operated as a percolation unit for dangerous wastes. This Chapter sets forth the modified closure requirements for this TSD unit. V.18.A. COMPLIANCE WITH APPROVED MODIFIED CLOSURE PLAN

The Permittees shall comply with all requirements set forth in the 1324 N Closure Plan found in Attachment 42 (DOE/RL 96-39, Rev. 1, Appendix B), including the Amendments specified in Condition V.18.B. Enforceable portions of the Plan are listed below; all subsections, figures, and tables included in these portions are also enforceable, unless stated otherwise:

ATTACHMENT 42:

Part A, Form 3, Permit Application, Revision 3, June 30, 1994

Section B1.0 — Introduction, from Class 1 Modifications for quarter ending September 30, 2001

Section B2.1 — General Description of Unit, from Class 1 Modifications for quarter ending September 30, 2001

Section B3.0 — Ground Water Monitoring, from Class 1 Modifications for quarter ending September 30, 2001

Section B4.0 — Closure, from Class 1 Modifications for quarter ending September 30, 2001

Section B5.0 — Post-Closure Plan, from Class 1 Modifications for quarter ending September 30, 2001

V.18.B. — AMENDMENTS TO THE APPROVED MODIFIED CLOSURE PLAN

V.18.B.1. — (Reserved)

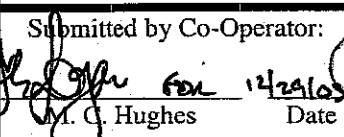
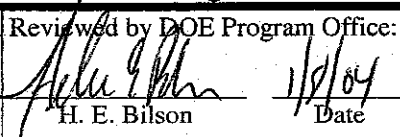
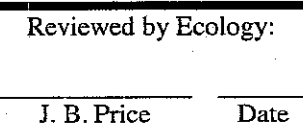
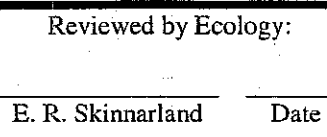
Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:		X		

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
 M. C. Hughes	 H. E. Bilson	 J. B. Price	 E. R. Skinnarland
Date	Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Forms

**1324-N Surface Impoundment
Part V, Chapter 18, Attachment 42**

Quarter Ending December 31, 2003

Index

Page 2 of 2: Hanford Facility RCRA Permit V.18.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

1324-NA Percolation Pond

Permit Part & Chapter:

Part V, Chapter 19, Attachment 42

Description of Modification:

Hanford Facility RCRA Permit V.19.: Because closure has been completed and certified, delete B1.0 through B4.0. These sections pertain to requirements that were applicable during closure of the 1324-NA Percolation Pond. Move this unit to Part VI, Chapter 3, for postclosure requirements for the 1324-N Surface Impoundment and 1324-NA Percolation Pond.

CHAPTER 19

1324-NA Percolation Pond

The 1324-NA Percolation Pond is an inactive TSD unit that is currently undergoing modified closure activities. This TSD unit was operated as a surface impoundment unit for dangerous wastes. This Chapter sets forth the modified closure requirements for this TSD unit.

V.19.A. COMPLIANCE WITH APPROVED MODIFIED CLOSURE PLAN

The Permittees shall comply with all requirements set forth in the 1324-N Closure Plan found in Attachment 42 (DOE/RL-96-39, Rev. 1, Appendix B), including the Amendments specified in Condition V.18.B. Enforceable portions of the Plan are listed below; all subsections, figures, and tables included in these portions are also enforceable, unless stated otherwise:

ATTACHMENT 42:

Part A, Form 3, Permit Application, Revision 3, June 30, 1994

Section B1.0 — Introduction, from Class 1 Modifications for quarter ending September 30, 2001

Section B2.1 — General Description of Unit, from Class 1 Modifications for quarter ending September 30, 2001

Section B3.0 — Ground Water Monitoring, from Class 1 Modifications for quarter ending September 30, 2001

Section B4.0 — Closure, from Class 1 Modifications for quarter ending September 30, 2001

Section B5.0 — Post Closure Plan, from Class 1 Modifications for quarter ending September 30, 2001

V.19.B. AMENDMENTS TO THE APPROVED MODIFIED CLOSURE PLAN

V.19.B.1. (Reserved)

Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:

Reviewed by DOE Program Office:

Reviewed by Ecology:

Reviewed by Ecology:

M. C. Hughes

Date

H. E. Bilson

Date

J. B. Price

Date

E. R. Skinnarland

Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Forms

**1324-NAPercolation Pond
Part V, Chapter 19, Attachment 42**

Quarter Ending December 31, 2003

Index

Page 2 of 2: Hanford Facility RCRA Permit V.19.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Part VI, Chapter 3, Attachment 42

Description of Modification:

Hanford Facility RCRA Permit VI.3: Move 1324-N Surface Impoundment (Part V, Chapter 18) and 1324-NA Percolation Pond (Part V, Chapter 19) from Part V, to Part VI, Chapter 3, 1324-N Surface Impoundment and 1324 NA Percolation Pond for Postclosure requirements.

CHAPTER 3

1324-N Surface Impoundment & 1324-NA Percolation Pond

The 1324-N Surface Impoundment and 1324-NA Percolation Pond are inactive TSD units that completed modified closure activities. 1324-N Surface Impoundment was operated as a surface impoundment for dangerous wastes. 1324-NA Percolation Pond was operated as a percolation unit for dangerous wastes. This Chapter sets forth the postclosure requirements for these TSD units.

VI.3.A. COMPLIANCE WITH APPROVED POST CLOSURE PLAN

The Permittees shall comply with all requirements set forth in Attachment 42, including the Amendments specified in Condition VI.3.B. Enforceable portions for postclosure are in Attachment 42 and are identified as follows. All subsections, figures, and tables included in these portions are also enforceable, unless stated otherwise:

ATTACHMENT 42:

- Chapter 1.0 Part A, Permit Application, Revision 3A, December 31, 2003
 1324-N Surface Impoundment, Revision 3A, December 31, 2003
 1324-NA Percolation Pond, Revision 3A, December 31, 2003
- Chapter 2.0 Institutional Control and Periodic Assessments, from Class 1 Modifications for quarter ending December 31, 2003
- Chapter 3.0 Postclosure Groundwater Monitoring, from Class 1 Modifications for quarter ending December 31, 2003
- Chapter 4.0 Training, from Class 1 Modifications for quarter ending December 31, 2003
- Chapter 5.0 Security, from Class 1 Modifications for quarter ending December 31, 2003
- Chapter 6.0 Postclosure Contact, from Class 1 Modifications for quarter ending December 31, 2003
- Chapter 7.0 Certification of Postclosure, from Class 1 Modifications for quarter ending December 31, 2003

VI.3.B. AMENDMENTS TO THE APPROVED MODIFIED CLOSURE PLAN

VI.3.B.1. (Reserved)

Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>M. C. Hughes</i> 12/29/03 M. C. Hughes Date	<i>H. E. Bilson</i> 1/2/04 H. E. Bilson Date	J. B. Price Date	E. R. Skinnarland Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:	Permit Part & Chapter:
1324-N Surface Impoundment & 1324-NA Percolation Pond	Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 1.0: Part A, Dangerous Waste Permit. This Chapter is provided in this modification package.

Chapter 1.0 contains the Part A, for 1324-N Surface Impoundment & 1324-NA Percolation Pond.



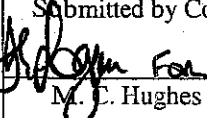
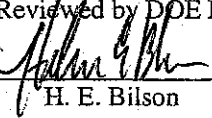
Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:		X		

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
 M. C. Hughes	 H. E. Bilson	J. B. Price	E. R. Skinnarland
12/29/02 Date	1/8/04 Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 2.0: Institutional Controls and Periodic Assessments. This Chapter is provided in this modification package.


Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:

Reviewed by DOE Program Office:

Reviewed by Ecology:

Reviewed by Ecology:

M. C. Hughes

Date

H. E. Bilson

Date

J. B. Price

Date

E. R. Skinnarland

Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 1324-N Surface Impoundment & 1324-NA Percolation Pond	Permit Part & Chapter: Part VI, Chapter 3, Attachment 42
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Description of Modification:

Chapter 3.0: Postclosure Groundwater Monitoring. This Chapter is provided in this modification package.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:		X		

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>M. E. Hughes</i> M. E. Hughes	<i>H. E. Bilson</i> H. E. Bilson	<i>J. B. Price</i> J. B. Price	<i>E. R. Skinnarland</i> E. R. Skinnarland
Date	Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Permit Part & Chapter:

Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 4.0: Training. This Chapter is provided in this modification package.


Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class ¹1

Class 2

Class 3

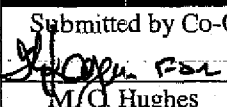

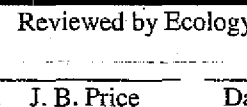
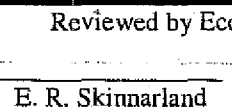
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Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
 M. C. Hughes	 H. E. Bilson	 J. B. Price	 E. R. Skinnarland
Date	Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 5.0: Security. This Chapter is provided in this modification package.


Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

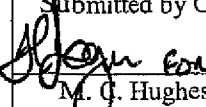
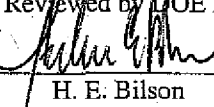
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Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
 M. G. Hughes	 H. E. Bilson	J. B. Price	E. R. Skinnarland
12/29/03 Date	1/9/04 Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 6.0: Postclosure Contact. This Chapter is provided in this modification package.


Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:

Reviewed by DOE Program Office:

Reviewed by Ecology:

Reviewed by Ecology:

M. C. Hughes

Date

H. E. Bilson

Date

J. B. Price

Date

E. R. Skinnarland

Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

1324-N Surface Impoundment & 1324-NA Percolation Pond

Part VI, Chapter 3, Attachment 42

Description of Modification:

Chapter 7.0: Certification of Postclosure. This Chapter is provided in this modification package.


Modification Class: ¹²³

Class 1

Class ¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>M. C. Hughes</i> 12/26/03	<i>H. E. Bilson</i> 1/8/04	J. B. Price	E. R. Skinnarland
Date	Date	Date	Date

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Forms

**1324-N Surface Impoundment & 1324-NAPercolation Pond
Part VI, Chapter 3, Attachment 42**

Quarter Ending December 31, 2003

Index

Page 2 of 9:	Hanford Facility RCRA Permit VI.3
Page 3 of 9:	Chapter 1.0
Page 4 of 9:	Chapter 2.0
Page 5 of 9:	Chapter 3.0
Page 6 of 9:	Chapter 4.0
Page 7 of 9:	Chapter 5.0
Page 8 of 9:	Chapter 6.0
Page 9 of 9:	Chapter 7.0